EXHIBIT A

Note: Reproduced below are Interrogatory Nos. 7-9 to Defendants' Second Set of Interrogatories to Lead Plaintiff Pension Trust Fund for Operating Engineers ("Plaintiff"), dated March 9, 2021; Plaintiff's Responses and Objections to Defendants' Second Set of Interrogatories, dated April 8, 2021; and Plaintiff's Supplemental Responses and Objections to Defendants' Second Set of Interrogatories, No. 7, dated May 6, 2021.

INTERROGATORY NO. 7:

For each statement at issue in this case that you allege to be false or misleading, identify: (a) the challenged statement; and (b) the speaker, date, and location of the challenged statement. For purposes of this set of interrogatories the challenged statements are those you allege remain at issue in this case following the Court's October 30, 2019 Order Denying Motion to Dismiss [Dkt. 67] and December 19, 2019 Order Clarifying Order Denying Motion to Dismiss and Denying Leave to Move for Reconsideration [Dkt. 72].

RESPONSE TO INTERROGATORY NO. 7:

Lead Plaintiff incorporates each of the foregoing General Objections above as if set forth herein. Lead Plaintiff also objects to this Interrogatory as compound, as it contains multiple subparts seeking discrete information, but purports to count as only one interrogatory for purposes of the limitations set forth in Rule 33. Lead Plaintiff expressly reserves all rights to treat each discrete subpart of this Interrogatory as a separate interrogatory for purposes of the limitations set forth in Rule 33 or in any subsequent court order modifying such limitations in the above-captioned action.

Lead Plaintiff also objects to this Interrogatory on the grounds that it calls for a legal conclusion, a legal argument or constitutes a contention discovery request that is premature at this stage of the litigation. *See, e.g.*, *Folz v. Union Pac. R.R. Co.*, No. 13-CV-00579-GPC-(PCL), 2014 U.S. Dist. LEXIS 15020, at *5-*6 (S.D. Cal. Jan. 31, 2014) ("many courts have found that, within the framework of Rule 33, contention interrogatories need not be answered until the substantial completion of pretrial discovery") (citing *In re eBay Seller Antitrust Litig.*, No. C-07-1882 JF (RS), 2008 U.S. Dist. LEXIS 102815 (N.D. Cal. Dec. 11, 2008), and *City & County of San Francisco v. Tutor-Saliba Corp.*, 218 F.R.D. 219, 222 (N.D. Cal. 2003)); *see also Folz*, 2014 U.S. Dist. LEXIS 15020, at *6 ("courts are reluctant to allow contention interrogatories, especially when the responding party has not yet obtained enough information through discovery to respond") (citing *In re Convergent Techs. Sec. Litig.*, 108 F.R.D. 328, 338 (N.D. Cal. 1985), and *United States v. Bazaarvoice, Inc.*, No. C-13-00133 EMC (LB), 2013 U.S. Dist. LEXIS 58237 (N.D. Cal. Apr. 22, 2013)).

Subject to and without waiving the foregoing objections, Lead Plaintiff responds as follows: The false and misleading statements and omissions that form the basis of the Complaint are identified in the Complaint and include those referenced in ¶¶135-139, 141-151, 154-156, 162, 164, 168-181.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 7:

Lead Plaintiff's response above is sufficient to respond to Interrogatory No. 7 as written. Subject to and without waiving any of its objections, Lead Plaintiff incorporates the response and objections above and further responds below. Lead Plaintiff reserves the right to add or reinstate statements or further supplement this response should it discover additional information responsive to this Interrogatory.

DATE/EVENT	SPEAKER/FALSE AND MISLEADING STATEMENT[1]
Complaint, ¶169: October 24, 2013 Fiscal Year Second Quarter of 2014 ("FY2Q14") Form 8-K, signed by Beer, and FY2Q14 Form 10-Q, signed and certified by Hammergren and Beer	**Revenues for 2014 increased compared to the same periods a year ago primarily due to our Distribution Solutions segment, which accounted for approximately 98% of our consolidated revenues.** [Distribution Solutions] **Direct distribution and services revenues increased primarily due to market growth, which includes growing drug utilization and price increases, our mix of business**, new customers, a shift of revenues from sales to customers' warehouses and one additional sales day. These increases were partially offset by price deflation associated with brand to generic drug conversions. * * * **Gross profit and gross profit margin increased for the second quarter and first six months of 2014 compared to the same periods a year ago for both of our segments.** [Distribution Solutions] **Distribution Solutions segment's gross profit margin increased primarily due to** our acquisition of PSS World Medical, **an increase in buy margin, increased sales of higher margin generic drugs** and a lower proportion of revenues within the segment attributed to sales to customers' warehouses. These increases were partially offset by a decrease in sell margin and a charge related to the LIFO method of accounting for inventories. **Buy margin primarily reflects volume and timing of compensation from** branded and **generic pharmaceutical manufacturers.** * * * [Segment Operating Profit] **Operating profit margin for our Distribution Solutions** and Technology Solutions **segments benefited for the second quarter and first six months of 2014 from an increase in gross profit margin,** partially offset by higher operating expenses as a percentage of revenues.

[1] The challenged statements are bolded.

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Complaint, ¶135: October 24, 2013 FY2Q14 earnings call	Hammergren: **Based on our performance for the first half of the fiscal year and our improved outlook for the year, we are raising our full year guidance and now expect to achieve adjusted earnings per diluted share from continuing operations of $8.40 to $8.70.** **. . . Distribution solutions revenue grew 11% for the quarter and adjusted operating profit grew 18%. Within our distribution solutions segment our US pharmaceutical business had another quarter of outstanding results . . .** **. . . In the second quarter, we continue to experience favorable pricing on certain products in our generics portfolio, principally driven by a few products where there has been supply disruption.**
Complaint, ¶136: November 12, 2013 Credit Suisse Healthcare Conference	Glen Santangelo, Analyst, Credit Suisse: You just came off a fantastic fiscal second quarter, raised guidance again for the second time, the magnitude of the beats has been a little bit startling for folks and everyone's trying to understand how is McKesson putting up these big gross margin beats. Maybe if you could talk about some of the underlying drivers of the strength in the core pharmaceutical distribution business and the question that I get a lot is the sustainability of those underlying trends and how you think about that through the balance of the fiscal year? * * * Hammergren: **I might also mention clearly there has been some supply issues associated with generics in the market and some of those supply issues might have caused more price inflation on certain products than might have otherwise existed in a normal steady state.**
Complaint, ¶137: January 13, 2014 J.P. Morgan Healthcare Conference	Hammergren: So the question was drug price inflation, generic drug price inflation, and how do we view the rest of this year and do we see it continuing and what are the drivers of it. **But you should be aware of the fact that this is driven in a very small slice of the generic portfolio.** **It is not all the manufacturers and it is not all the product. It is in a very small area and we think a lot of that price opportunity has been delivered to the manufacturers because of issues associated with the supply. They have behaved responsibly in an environment where there are fewer of them in the marketplace and we have been able to optimize our performance in that.**
Complaint, ¶170: January 30, 2014 Fiscal Year Third Quarter of 2014 ("FY3Q14") Form	**Revenues for 2014 increased compared to the same periods a year ago primarily due to our Distribution Solutions segment, which accounted for approximately 98% of our consolidated revenues.** * * *

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8-K, signed by Beer, and FY3Q14 Form 10-Q, signed and certified by Hammergren and Beer	**Gross profit and gross profit margin increased for the third quarter and first nine months of 2014 compared to the same periods a year ago primarily as a result of growth in our Distribution Solutions segment.** [Distribution Solutions] **Distribution Solutions segment's gross profit margin increased primarily due to** our acquisition of PSS World Medical, **increased sales of higher margin generic drugs, an increase in buy margin** and a lower proportion of revenues within the segment attributed to sales to customers' warehouses. These increases were partially offset by a charge related to the LIFO method of accounting for inventories and a decrease in sell margin. **Buy margin primarily reflects volume and timing of compensation from** branded and **generic pharmaceutical manufacturers.** * * * [Segment Operating Profit] **Operating profit margin for our Distribution Solutions segment decreased for the third quarter of 2014 and increased for the first nine months of 2014. Operating profit margin for our Distribution Solutions segment in 2014 was impacted by increased gross profit margin** and higher operating expenses as a percentage of revenues associated with our acquisition of PSS.
Complaint, ¶138: January 30, 2014 FY3Q14 earnings call	Hammergren: **Distribution Solutions continues to deliver strong operating performance. In the third quarter, revenue grew 10%, and adjusted operating profit grew 37%.** **Within our Distribution Solutions segment, our US Pharmaceutical business had another quarter of outstanding results. Direct distribution and services revenues increased 11% for the quarter.** **In the third quarter, we continued to experience price inflation in a relatively small subset of our generics portfolio. Consistent with the expectations we outlined in the second quarter, inflation in our fiscal third-quarter moderated from what we had experienced in the second quarter.** * * * Beer: **Distribution Solutions adjusted gross profit increased 27% for the quarter on 10% revenue growth, resulting in a 65 basis point improvement in our adjusted gross profit margin.** In addition to the PSS acquisition, **our third-quarter gross profit in Distribution**

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	Solutions benefited from continued favorable performance within our generics pharmaceutical business. * * * Hammergren: **[T]he real strength is really coming still out of our generics business. Our One Stop revenues were up nicely.** * * * **That is what delivers a great business and a great business model. I see no reason to believe that we can't continue to focus on gross margins as a top priority. I don't see any negative mix change occurring in our Business, and generics continue to be a propellant across the board if you think about our sourcing.**
Complaint, ¶171: May 12, 2014 Fiscal Year Fourth Quarter of 2014 ("FY4Q14") Form 8-K, signed by Beer, and May 14, 2014 Fiscal Year 2014 ("FY2014") Form 10-K, signed and certified by Hammergren and Beer	[From May 14, 2014 Form 10-K] **Revenues for 2014 increased 13% to $137.6 billion from 2013 and revenues for 2013 of $122.1 billion approximated 2012. Increases in our revenues were primarily driven by our Distribution Solutions segment, which accounted for approximately 98% of our consolidated revenues.** *Distribution Solutions* **North America pharmaceutical distribution and services revenues increased in 2014 compared to 2013 primarily due to market growth, reflecting growing drug utilization and price increases, and our mix of business.** These increases were partially offset by price deflation associated with brand to generics drug conversion. **North America revenues for 2013 approximated 2012 primarily due to market growth and our mix of business**, partially offset by price deflation associated with brand to generic drug conversions, the loss of customers and fewer sales days. * * * **Distribution Solutions segment's gross profit margin increased in 2014 compared to 2013 primarily due to** our business acquisitions, **growth in sales of higher margin generic drugs, and an increase in buy margin. Buy margin primarily reflects volume and timing of compensation we receive from pharmaceutical manufacturers.** These increases were partially offset by a decrease in sell margin and charges related to the LIFO method of accounting for inventories, as further described below. Additionally, gross profit was impacted by a $50 million charge for the reversal of a fair value step-up of inventory acquired as part of the Celesio acquisition. **Gross profit margin increased in 2013 compared to 2012 primarily due to higher sales of generic drugs,** business acquisitions, **an increase in buy margin** and antitrust settlement

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	receipts, and a lower proportion of revenues within the segment attributed to lower-margin sales to customers' warehouses. These increases were partially offset by a decrease in sell margin. * * * [Segment Operating Profit] **Operating profit margin for our Distribution Solutions segment in 2014 was flat compared to 2013, primarily reflecting an increase in gross profit margin** and the $191 million impairment charge on an equity investment incurred in 2013, partially offset by higher operating expenses as a percentage of revenues, which includes the effects of our acquisitions. **Operating profit margin for our Distribution Solutions segment decreased in 2013 compared to 2012** primarily due to the $191 million impairment charge on an equity investment and higher operating expenses as a percentage of revenues, which included the effects of our acquisitions. **These 2013 increases were partially offset by an increase in gross profit margin.** * * * 2015 Outlook **Information regarding the Company's 2015 outlook is contained in our Form 8-K dated May 13, 2014[2].** * * * [From May 12, 2014 Form 8-K] **McKesson Corporation (NYSE:MCK) today reported that revenues for the fourth quarter ended March 31, 2014 were $38.1 billion, up 25% compared to $30.5 billion a year ago. On the basis of U.S. generally accepted accounting principles ("GAAP"), fourth-quarter earnings per diluted share from continuing operations was $1.56 compared to $1.11 a year ago.** **For the fiscal year, McKesson had revenues of $137.6 billion compared to $122.1 billion a year ago. Full-year GAAP earnings per diluted share from continuing operations was $5.83 compared to $5.62 a year ago.** * * * **Distribution Solutions revenues were up 26% for the fourth quarter and up 13% for the full year compared to the prior year.**

[2] McKesson did not file a Form 8-K on May 13, 2014. The correct date for the Form 8-K with 2015 outlook is May 12, 2014.

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	North America pharmaceutical distribution and services revenues, which include results from U.S. Pharmaceutical, McKesson Canada and McKesson Specialty Health, **were up 9% for the fourth quarter, primarily reflecting market growth and growth from existing customers. For the full year, North America pharmaceutical distribution and services revenues were up 7% compared to the prior year.** * * * [Distribution Solutions] **In the fourth quarter, Distribution Solutions GAAP operating profit was $605 million and GAAP operating margin was 1.62%. Fourth-quarter adjusted operating profit was $905 million and the adjusted operating margin was 2.42%. For the full year, GAAP operating profit was $2.5 billion and GAAP operating margin was 1.83%. For the full year, adjusted operating profit was $3.2 billion, up 30% from the prior year, and the adjusted operating margin was 2.39%, up 31 basis points year-over-year.** [Segment Operating Profit] "**Distribution Solutions had another outstanding year with strong performance across the segment.** We continue to deliver tremendous value for our customers through the combination of our industry-leading service, our depth of experience in the healthcare supply chain and our global sourcing expertise," said Hammergren. * * * Fiscal Year 2015 Outlook "**Our Fiscal 2015 guidance reflects solid growth across our broad portfolio of businesses** and McKesson's share of the results of Celesio. **McKesson expects Adjusted Earnings per diluted share between $10.40 and $10.80 for the fiscal year ending March 31, 2015,"** Hammergren concluded. Key Assumptions for Fiscal Year 2015 Outlook **The Fiscal 2015 outlook is based on the following key assumptions …:** * * * • **Price trends on generic drugs outside an exclusivity period are expected to be in the high single digits in Fiscal 2015, a decline from the price trends experienced in Fiscal 2014.**
Complaint, ¶139: May 12, 2014	Beer: **Adjusted gross profit increased 35% for the quarter and 26% for the full year, to $8.6 billion, primarily driven by strong**

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FY4Q14 earnings call	**execution in our distribution businesses, market growth[3]** and our acquisitions of Celesio and PSS. * * * **Overall, this year's earnings per share benefited significantly from the strong performance in our US pharmaceutical business. Specifically, the favorable performance across our entire portfolio of generic pharmaceutical offerings**.
Complaint, ¶141: May 20, 2014 UBS Global Healthcare Conference	Beer: **Well we would continue, as was the case last year, to expect that the price increases would be driven by a relatively small proportion of the overall portfolio of generic drugs that we distribute. And we would also continue to expect that those drugs prices would be increasing as a result of some sort of supply disruption. And there can be different types of those disruptors, whether it's the FDA going in to a particular plant and shutting it down for some period of time, whether it is a specific manufacturer deciding to close down a product line within their operation for their own return on investment needs. It can be different things.** **But we would continue to expect those supply disruptions to really be the driving force underpinning those expected price increases.**
Complaint, ¶142: June 11, 2014 Goldman Sachs Healthcare Conference	Bob Jones, Analyst, Goldman Sachs: Another big topic that I think people think a lot about in this environment is price inflation, and specifically generic price inflation. You know, your guidance called for high single digit generic price inflation. I was just wondering if you could share a little bit. What do you think has been driving generic price inflation or even in some cases the lack of deflation relative to what I think we grew accustomed to years ago? And how sustainable do you think that is, as we not only look out to this year but for the next several years for the industry? Beer: **I think what has been driving it in this past year, fiscal 2014, and what we are expecting to continue into 2015, is really some measure of supply disruption. The causes of those supply disruptions can differ. Sometimes they will be FDA driven where the FDA comes in and shuts down the plant for one reason or another.** **Other supply disruptions will be driven by where a specific manufacturer deciding to make a decision about a plant of theirs or a line within a plant for purposes of their own capital return needs. So**

[3] "Market growth" was defined in the FY2014 Form 10-K as "reflecting growing drug utilization and price increases." *See* Complaint, ¶171.

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	it can be driven by a variety of factors. But at the heart of it is our view that it is a supply disruption that is driving the price increase, and we are seeing these price increases on a very small proportion of the overall set of pharmaceuticals that we distribute. **And that was the case again in fiscal 2014, where we saw double-digit type growth in prices year over year. We expect that to continue to be the case in fiscal 2015, where we expect a lesser percentage growth rate, high single digits is what we said. But those you are alluding to, still that is significantly higher than what we've seen in the last several years prior to fiscal 2014.**
Complaint, ¶143: June 25, 2014 McKesson's Annual Investor Day	Paul Julian, EVP and MDS Group President, McKesson Corporation: **We had generated significant operating cash flow on our US Pharma business . . . . And as you'll hear later on, we continue to expand our operating margins in our largest core business which is US Pharmaceutical.** * * * Beer: **Well, looking back over the last several years, the distribution segment team has driven an impressive 5% compound annual growth rate at the top line. And they have been able to leverage that into a 14% CAGR at the operating profit line.** * * * **In terms of manufacturer economics,** both on the branded side and **on the generic side of the business, this translates through into benefits for us around price increases.**
Complaint, ¶172: July 31, 2014 Fiscal Year First Quarter of 2015 ("FY1Q15") Form 8-K, signed by Beer, and FY1Q15 Form 10-Q, signed and certified by Hammergren and Beer	**Revenues for the first quarter of 2015 increased 37% to $44.1 billion compared to the same period a year ago primarily due to our Distribution Solutions segment, which accounted for approximately 98% of our consolidated revenues.** [Distribution Solutions] **North America pharmaceutical distribution and services revenues increased in the first quarter of 2015 primarily due to our mix of business and market growth, reflecting growing drug utilization and price increases.** These increases were partially offset by price deflation associated with brand to generics drug conversion. * * * **Gross profit increased 45% to $2.8 billion and as a percentage of revenue, gross profit margin increased 36 bp in the first quarter compared to the same period a year ago. These increases primarily**

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	reflect an increase in our Distribution Solutions operating segment, including our acquisition of Celesio. Distribution Solutions **Distribution Solutions segment's gross profit margin increased primarily due to** our acquisition of Celesio and **growth in our North American distribution and services business which reflects sales of higher margin generic drugs and an increase in buy margin**, partially offset by a decrease in sell margin. **Buy margin includes volume and timing of compensation from pharmaceutical manufacturers.** * * * [Segment Operating Profit] **Operating profit margin for our Distribution Solutions segment decreased in the first quarter of 2015 primarily due to higher operating expenses as a percentage of revenues, partially offset by an increase in gross profit margin.**
Complaint, ¶144: July 31, 2014 FY1Q15 earnings call	Hammergren: **Within our US pharmaceutical business, we also experienced solid growth across our portfolio of generic** and brand **pharmaceuticals, driven in part by the timing of certain generic** and brand **price increases, which came earlier in the fiscal year than we had originally planned. It is important to note, however, that our full-year expectations for** both brand and **generic inflation remain unchanged.** * * * Beer: **In addition, as John mentioned, this quarter we recorded solid growth across our portfolio of generic** and branded **pharmaceuticals, driven in part by the timing of certain generic** and brand **price increases, which came earlier in the fiscal year than we had originally planned. On a constant-currency basis, revenues increased 15%.**
Complaint, ¶145: September 9, 2014 Morgan Stanley Healthcare Conference	Beer: **It has certainly been an important financial driver in the last few quarters. What we said at the outset of the year when we gave our annual guidance was that we expected high single digit growth from generic price increases or importantly, generics that are beyond their exclusivity period so a little more mature than the brand new brands to generic conversion drugs. We see this playing out thus far so we are very much speaking to that view for the full year.** **In Q1 we saw a little bit of acceleration of some of those price increases** both **on** the brand and **the generic side coming a little earlier than we expected but very much reaffirming the full year view of high single digit growth rates year over year. That is a little bit less than**

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	what we saw last year where it was double digit growth rate but still in a broader historical context, quite strong. **Our experience continues to be that we are seeing these price increases where there is some sort of supply disruption occurring in the market for that molecule and that occurring broadly for two reasons. Either the FDA has gone into a plant, shut it down, shut down a line within a plant for some period of time or alternatively, we are seeing some generic manufacturers making decisions to shut down a line for one type of a molecule, perhaps switch that capacity into an alternative molecule that they judge can give a better return on their capital invested for their investors.** **So it is very much supply disruption driven in our view and of course, we are seeing that happen in a relatively small proportion of the generic manufacturers and within those manufacturers, a relatively small proportion of their molecules, their drugs. Where we do see a price increase occurring around a molecule, it can sometimes be quite high. So that is the situation that we are seeing play out around generic price inflation.**
Complaint, ¶146: September 30, 2014 Leerink Partners Services Roundtable	Dave Larsen, Analyst, Leerink Partners: If I could add onto that, even all this incremental generic buying power that all the distributors have, why are we seeing this generic price inflation? Beer: **We continue to see the product inflation being driven by supply shortages of really a couple of flavors either where the FDA is taking some action around enforcement that is shutting down a line or a plant at a particular manufacturer. Or the other flavor really being where a manufacturer has for their own financial return reasons, their own resource allocation priorities, elected to do likewise to shut down a plant, maybe a line, maybe reduce capacity on a line, some flavor of that sort of activity that reduces the overall supply of a drug from that one source providing opportunity for other sources to raise prices.** **Now it's important, I think, to note that we continue to see this occurring on a really small minority of the generic pharmaceuticals with which we work. So a small minority of the manufacturers, and then within that subset, them taking a small minority of the pharmaceuticals that they manufacture.** **That said, sometimes the price increases that do occur can be quite large in percentage terms in a particular molecule. So we are continuing to see that play out as we have discussed in recent quarters.**

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Complaint, ¶173: October 28, 2014 Fiscal Year Second Quarter of 2015 ("FY2Q15") Form 8-K, signed by Beer, and FY2Q15 Form 10-Q, signed and certified by Hammergren and Beer	**Revenues for 2015 increased compared to the same period a year ago primarily due to our Distribution Solutions segment, which accounted for approximately 98% of our consolidated revenues.** Distribution Solutions **North America pharmaceutical distribution and services revenues increased primarily due to our mix of business and market growth. Market growth reflects growing drug utilization, which includes newly launched drugs, and price and volume increases.** * * * **Gross profit and gross profit margin increased for the second quarter and first six months of 2015 compared to the same periods a year ago primarily due to an increase in our Distribution Solutions operating segment**, including our acquisition of Celesio. Distribution Solutions **Distribution Solutions segment's gross profit increased in the second quarter and first six months of 2015 primarily due to** our acquisition of Celesio and **growth in our other Distribution Solutions businesses.** These increases were partially offset by higher LIFO inventory charges. **Gross profit margin increased for the second quarter and first six months of 2015** primarily due to our acquisition of Celesio, **partially offset by our mix of business in our other Distribution Solutions businesses. The segment's gross profit margin for the second quarter of 2015 primarily reflects a decrease** in sell margin and higher LIFO charges**, partially offset by the sale of higher margin generic drugs. The segment's gross profit margin for the first six months of 2014 reflects a decrease** in sell margin and higher LIFO charges**, partially offset by an increase in buy margin. Buy margin includes volume and timing of compensation from pharmaceutical manufacturers.** * * * [Segment Operating Profit] **Operating profit for our Distribution Solutions segment increased in 2015 due to growth in our businesses** and our acquisition of Celesio**.**
Complaint, ¶147: October 28, 2014 FY2Q15 earnings call	Beer: **Distribution Solutions adjusted gross profit increased 58% for the quarter on 37% revenue growth, resulting in an 80 basis point improvement in our adjusted gross profit margin, driven by** our acquisition of Celesio and **market growth.** * * *

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	As a reminder, for the full year our expectations for branded and **generic drug price inflation remain unchanged . . . .** * * * Robert Jones, Analyst, Goldman Sachs: I guess just my follow up around generic purchasing, there is some chatter or concern in the marketplace that maybe some of the synergies that were originally mapped out on paper relative to these purchasing consortiums might not be translating at the actual negotiations level with generic manufacturers. I'm just wondering if you could comment around how your negotiations have progressed as you've gone out to the generic manufacturers around buying better with more scale, and any change relative to the original or previous expectations that you laid out around the procurement benefit? * * * Hammergren: **We continue to build our book of business which adds significant value to the manufacturing partners that are part of our solution going forward**, and deliver significant value to the customers that have availed themselves of not only the price points that are available through McKesson because of our scale, but also to the service offering that we make available to our customers that take them out of the logistics business that is clearly more superior coming from McKesson. **So I would say that we remain extremely optimistic, and the data that we're seeing continues to positively reinforce the decisions we've made around generic sourcing.**
Complaint, ¶148: January 13, 2015 J.P. Morgan Healthcare Conference	Beer: **We very much feel as though we're right on track with the guide that we offered right at the start of the fiscal year for high single digit generic price inflation for drugs outside of the exclusivity period. And so we're very much continuing to see some sort of supply disruption at the root of these price increases, whether it's from a government related action, whether it's shutting down a line or a plant or backlog of approvals or whether it's a manufacturer taking a decision on their own to reallocate their capital. So, some sort of driver of supply disruption and as we see things today, we don't expect that to change.**
Complaint, ¶174: February 5, 2015 Fiscal Year Third Quarter of 2015 ("FY3Q15") Form 8-K, signed by Beer, and FY3Q15 Form 10-Q, signed and certified by	**Revenues for 2015 increased compared to the same period a year ago primarily due to our Distribution Solutions segment, which accounted for approximately 98% of our consolidated revenues.** [Distribution Solutions] **North America pharmaceutical distribution and services revenues increased primarily due to market growth and our mix of businesses.**

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Hammergren and Beer	**Market growth reflects growing drug utilization, which includes newly launched drugs, and price and volume increases.** * * * **Gross profit and gross profit margin increased for the third quarter and first nine months of 2015 primarily due to an increase in our Distribution Solutions segment. . . .** Distribution Solutions **Distribution Solutions segment's gross profit increased in the third quarter and first nine months of 2015 primarily due to** our acquisition of Celesio and **growth in our other Distribution Solutions businesses. Gross profit margin increased in 2015 primarily due to** our acquisition of Celesio and **higher buy margin reflecting higher volume and price increases of pharmaceutical products.** * * * Segment Operating Profit: **Distribution Solutions: Operating profit for our Distribution Solutions segment increased in 2015 primarily reflecting growth in our businesses** and our acquisition of Celesio**.**
Complaint, ¶149: February 5, 2015 FY3Q15 earnings call	Beer: **Distribution Solutions adjusted gross profit increased 63% for the quarter on 38% revenue growth, resulting in an 87 basis point improvement in our adjusted gross profit margin, driven by** our acquisition of Celesio and **to market growth.** * * * George Hill, Analyst, Deutsche Bank: I guess, John, noticeably absent from the commentary this call was thoughts on generic drug price inflation. A few of your peers have talked about motivating generic drug price inflation. I thought you might give us an update on what the customer's is saying? Hammergren: **Our view on generic price inflation is basically in line with how we viewed the year as we came into the year. We said that we felt it was going to be generally flat with last year, perhaps slightly down compared to prior year. I think our view has remained consistent and remains consistent as we think about what we have accomplished in the first three quarters and what we have in front of us.**
Complaint, ¶150: March 3, 2015 Cowen Health Care Conference	Unidentified Participant: But maybe the one that's probably on top of mind a lot of people is generic inflation. A lot of commentary may be at the start of the earnings season that kind of suggests that things had slowed down, now starting to hear more commentary on things maybe picking

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	back up. How do you guys see the inflation environment currently, and what are sort of the puts and takes on how could that help investors think about what to expect going forward? Beer: **Certainly, when we started our fiscal year we indicated that we expected to see generic inflation in the high single-digit percentage growth rate levels year over year. So a little bit less than what we had seen in fiscal 2014, but fell in advance in the higher levels than we had seen historically down through the years. And we are now into our fourth quarter of fiscal 2015, and we are generally seeing things track along pretty much as we had expected. We continue to see some sort of supply disruption at the heart of these increases in generic prices, whether it is as a result of the FDA shutting down the line as a manufacturer, whether it's the FDA just being behind on applications, the new generics, or whether it's a manufacturer taking a decision to shift the way they invest their capital from one line, from one product, one molecule to another based on their own return-on-capital needs. So that's a set of points, really, that's been pretty consistent throughout this fiscal year for us. So no particular change from what we expected right at the start.** * * * **And so I think the FDA has a significant challenge ahead of itself to be able to, in essence, assure the quality of the drugs being produced in all the different countries and different plants around the world. So I wouldn't necessarily say or necessarily assume that the FDA issues that I refer to are transitory.**
Complaint. ¶175: May 12, 2015 Fiscal Year Fourth Quarter of 2015 ("FY4Q15") Form 8-K, signed by Beer, and Fiscal Year 2015 ("FY2015") Form 10-K, signed and certified by Hammergren and Beer	[From May 12, 2015 Form 10-K] **Revenues for 2015 increased 30% to $179.0 billion from 2014 and revenues for 2014 increased 12% to $137.4 billion from 2013. Increases in our revenues were primarily driven by our Distribution Solutions segment, which accounted for approximately 98% of our consolidated revenues.** Distribution Solutions **North America pharmaceutical distribution and services revenues increased over the last two years primarily due to market growth and our mix of business. Market growth reflects growing drug utilization, which includes newly launched drugs and price increases.** * * * **Distribution Solutions gross profit margin increased over the last two years primarily reflecting** our business acquisitions and **higher buy margin within our North American distribution business,**

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	partially offset by a decrease in sell margin primarily driven by higher sales volume, and an increase in LIFO-related inventory charges. **Buy margin primarily reflects volume and timing of compensation we receive from pharmaceutical manufacturers.** Gross profit margin for 2015 was also unfavorably affected by the increased sales associated with newly launched drugs for the treatment of Hepatitis C. **Gross profit margin for 2014 was also favorably affected by growth in sales of higher margin generic drugs.** * * * Segment Operating Profit: . . . **Operating profit margin in 2014 was flat compared to 2013 primarily reflecting an increase in gross profit margin** and the $191 million impairment charge on an equity investment incurred in 2013, partially offset by higher operating expenses as a percentage of revenues, which included the effects of our acquisitions. * * * 2016 Outlook **Information regarding the Company's 2016 outlook is contained in our Form 8-K dated May 12, 2015.** * * * [From May 12, 2015 Form 8-K] **McKesson Corporation (NYSE:MCK) today reported that revenues for the fourth quarter ended March 31, 2015 were $44.9 billion, up 19% compared to $37.8 billion a year ago. On the basis of U.S. generally accepted accounting principles ("GAAP"), fourth-quarter earnings per diluted share from continuing operations was $1.69 compared to $1.72 a year ago. . . .** **For the fiscal year, McKesson had revenues of $179.0 billion compared to $137.4 billion a year ago, up 30% year-over-year. Full-year GAAP earnings per diluted share from continuing operations was $7.54 compared to $6.08 a year ago, up 24% year-over-year.** * * * **Distribution Solutions revenues were up 19% on a reported basis and 23% on a constant currency basis for the fourth quarter. For the full year, Distribution Solutions revenues were up 31% on a reported basis and 33% on a constant currency basis compared to the prior year.** * * *

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	[Distribution Solutions] **In the fourth quarter, Distribution Solutions GAAP operating profit was $714 million and GAAP operating margin was 1.62%. Fourth-quarter adjusted operating profit was $1.1 billion and adjusted operating margin was 2.43%. For the full year, GAAP operating profit was $3.0 billion and GAAP operating margin was 1.73%. For the full year, adjusted operating profit was $4.2 billion, up 30% on a reported basis and 31% on a constant currency basis from the prior year, and adjusted operating margin was 2.38%.** [Segment Operating Profit] **"Distribution Solutions had another outstanding year with strong performance across the segment.** We continue to deliver tremendous value for our customers by developing solutions that help drive better business health. We are proud to be a global leader in healthcare services while remaining grounded in our tradition of operational excellence in everything we do," said Hammergren. * * * Fiscal Year 2016 Outlook **"Our Fiscal 2016 guidance reflects strong growth across our broad portfolio of businesses. McKesson expects Adjusted Earnings per diluted share of $12.20 to $12.70 for the fiscal year ending March 31, 2016, representing 12% to 16% growth year-over-year on a constant currency basis,"** Hammergren concluded. Key Assumptions for Fiscal Year 2016 Outlook **The Fiscal 2016 outlook is based on the following key assumptions . . .:** * * * • **Price trends on generic drugs outside an exclusivity period, in the U.S. market, are expected to be slightly below those we experienced in Fiscal 2015.**
Complaint, ¶151: May 12, 2015 FY4Q15 earnings call	Beer: **For the full year, adjusted gross profit increased 36% to $11.8 billion, primarily driven by** our acquisition of Celesio and **market growth, including strong execution in our distribution businesses.** * * * **For the full year, adjusted net income from continuing operations totaled $2.7 billion and our adjusted earnings per diluted share from continuing operations was $11.11. Overall, this year's adjusted earnings per share benefited significantly from our mix of business, specifically the favorable performance across our entire**

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	portfolio of generic pharmaceutical offerings and the contribution from our acquisition of Celesio. * * * **On a constant currency basis, Distribution Solutions total revenues increased 23% for the quarter and increased 33% for the full year. Revenue growth was driven primarily by** our acquisition of Celesio and **market growth in our North America pharmaceutical distribution and services business.** **During FY16, we anticipate Distribution Solutions revenues will increase by a mid single digit percentage over the prior year, driven by expected market growth and our mix of business. North American distribution business revenues increased 18% on a reported basis and 19% on a constant currency basis for the quarter.** * * * **As we look ahead to FY16, we expect continued growth in segment-adjusted operating profit, driven by the contribution from our generic business, specifically from expanded one-stop sales, and the breadth and depth of our global sourcing efforts. In addition, we** expect branded pricing trends to be consistent with the prior year and **anticipate generic drug pricing trends slightly below those observed in FY15.** * * * Glen Santangelo, Analyst, Credit Suisse: Thanks and good evening. I also want to follow up with one quick question on the guidance. It seems like one of the components of your guidance you talk about maybe lower pricing on the generic side in FY16 versus FY15. It's nice to have a conference call that's not dominated about generic price inflation. But, John, I'm curious, could you give us your perspective in terms of what you're seeing there? And are you actually seeing any changes in the market or do you just believe it's prudent to assume some level of normalization? Thanks. Hammergren: **Glen, I think you hit the same word I was going to use and that was prudent. I think we've seen a very robust cycle of generic inflation, at least as we view it, and clearly we expect it to continue. We expect it to moderate slightly as we give our guidance for next year.**
Complaint, ¶153: May 13, 2015 Bank of America Merrill Lynch	Beer: **Turning to FY2016, we were very pleased to be able to issue full-year guidance – in essence, 12% to 16% EPS growth on a constant currency basis. Again, coming off already strong FY2015 results; we are calling for continued growth and strength right across**

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Health Care Conference	**the Distribution Solutions business. Again, our generics business is very important to us and in very good condition.** * * * Robert Willoughby, Analyst, BofA Merrill Lynch: In the high end and the low end of the guidance range, what gets you to that high end, what gets you to the low end of the range? Beer: **Well, we talked about a few of the factors in our guide yesterday. Obviously generic price increases were an increasingly important factor during fiscal 2015 and I think that will be the case again in 2016. What we're expecting is generally generic drug pricing – might be price increases might be a little softer than we experienced in fiscal 2015. To the extent that that's a conservative guide then I think we can drift towards the north end of the range. To the extent that that's too aggressive a guide, and those price increases don't come through to the same degree, then I would expect to be towards the lower end of that range. So I think that's one important factor.**
Complaint, ¶154: June 9, 2015 Goldman Sachs Healthcare Conference	Robert Jones, Analyst, Goldman Sachs: I guess if we take a step back and look out longer-term, and I think, again, this probably applies more to the generic inflation, but do you think that we will continue to operate in an inflationary environment with generics as we think out two, three, five years down the road, or is this eventually a commodity business that, as you guys see it, would revert back to what it's done historically, which is deflate? Beer: **Well, we've talked about there being, really, three drivers of the generic price increases in the last couple of years or so, and at the heart, really, it's some sort of supply disruption that has been driving those price increases.** **And so there's three themes are really the FDA backlog, which doesn't appear to be getting shorter. The FDA taking some action that closes down a line or a plant at a particular manufacturer. Or a generic manufacturer making a decision on their own to shut a line or a plant for their own capital allocation, their own return needs. And we don't see anything particularly different out into the future in any of those three regards, but it's hard to predict.**
Complaint, ¶155: June 24, 2015 McKesson's Annual Investor Day	Mark Walchirk, President, US Pharmaceutical, McKesson Corporation: **And certainly, we continue to access a wide range of manufacturers across the generics environment, and that flexibility from a sourcing standpoint again allows us to make sure we have a competitive price in the marketplace, industry-leading service levels, et cetera.**

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	* * * Dave Larsen, Analyst, Leerink Partners: Can you just talk about generic inflation? What is driving it? And how is it trending relative to your expectations? * * * Beer: **And we continue to see the underlying drivers as some sort of supply disruption whether it's the FDA backlog, whether it's the FDA actions around a particular manufacturer's planned or line, or whether it's an individual manufacturer taking a decision around their own capacity, consistent with our own capital return goals.** **So we don't see any change in that dynamic. As John said, it's expecting – directionally it will hold a little bit less of the pricing dynamic this year versus last. And that was a reflection of the fact that we saw a little bit of softening sequentially in the last couple of quarters of fiscal 2015.**
Complaint, ¶176: July 29, 2015 Fiscal Year First Quarter of 2016 ("FY1Q16") Form 8-K, signed by Beer, and FY1Q16 Form 10-Q, signed and certified by Hammergren and Beer	**Revenues for the first quarter of 2016 increased 9% to $47.5 billion compared to the same period a year ago primarily due to our Distribution Solutions segment, which accounted for approximately 98% of our consolidated revenues. Excluding foreign currency exchange rate fluctuations of approximately 4%, revenues increased 13%.** Distribution Solutions **North America pharmaceutical distribution and services revenues for the first quarter of 2016 increased primarily due to market growth, which reflects growing drug utilization (price and volume increases, as well as newly launched drugs)**, and expanded business with existing customers. These increases were partially offset by price deflation associated with brand to generics drug conversions. * * * **Gross profit increased 4% for the first quarter of 2016 compared to the prior period. Excluding foreign currency exchange rate fluctuations of approximately 5%, gross profit increased 9% due to an increase in our Distributions Solutions** and Technology Solutions operating segments. **Gross profit margin decreased due to our Distribution Solutions segment.** Distribution Solutions **Distribution Solutions segment's gross profit for the first quarter of 2016 increased 4% compared to the prior year. Excluding foreign currency exchange rate fluctuations of approximately 6%, gross profit increased 10% primarily due to higher revenues from our**

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	North America pharmaceutical distribution businesses and $59 million of cash proceeds representing our share of antitrust legal settlements, which were recorded as a reduction to cost of sales. * * * Segment Operating Profit **Distribution Solutions: Operating profit in the first quarter of 2016 increased primarily due to higher gross profit and lower operating expenses.**
Complaint, ¶156: July 29, 2015 FY1Q16 earnings call	David Larsen, Analyst, Leerink Partners: Can you comment on the TEVA and Allergan transaction? Is that material or not with respect to generic inflation? Our checks indicate that as the generic industry consolidates, sometimes manufacturers raise price because they can. Just any thought here would be helpful. Thanks. Hammergren: **Well, we clearly have a very strong working relationship with both TEVA and Allergan. I think we see, as do you that the question of generic inflation has sometimes been driven by the ability for the price to actually benefit the generic manufacturers, or otherwise stick in the marketplace. So to the extent that the consolidation provides some of that opportunity, that would be a positive. I think that the market remains competitive.** I think these consolidations will help eliminate cost. **But I also think that McKesson's position in the market will continue to afford us an opportunity to work with these very large companies in a very positive way for both parties.**
Complaint, ¶157 September 16, 2015 Morgan Stanley Healthcare Conference	Beer: **And that said, we need to be thoughtful about the balance between growing that private label set of offerings and the relationships that we have with our various manufacturing partners. So there's always going to be a certain amount of balancing act there. Traditionally, NorthStar has focused on the more mature molecules. We tend to have more competitors. So that's an important consideration, as we think how to further progress activity at NorthStar, but very comfortable with their progress and pleased about their growth opportunities.**
Complaint, ¶177: October 29, 2015 Fiscal Year Second Quarter of 2016 ("FY2Q16") Form 8-K, signed by Beer, and FY2Q16 Form 10-	**Revenues for the second quarter and first six months of 2016 increased 10% compared to the same periods a year ago. Excluding unfavorable foreign currency effects of 4% and 3%, revenues increased 14% and 13% for the second quarter and first six months of 2016 primarily due to our Distribution Solutions segment, which accounted for approximately 99% of our consolidated revenues.** Distribution Solutions

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Q, signed and certified by Hammergren and Beer	**North America pharmaceutical distribution and services revenues for the second quarter and first six months of 2016 increased primarily due to market growth, which reflects growing drug utilization (price and volume increases, as well as newly launched drugs), and our business mix,** which includes increased volume with existing customers. These increases were partially offset by price deflation associated with brand to generics drug conversions. * * * **Gross profit for the second quarter of 2016 decreased 1% and for the first six months of 2016 increased 2% compared to the same periods a year ago. Excluding unfavorable foreign currency effects of 5%, gross profit increased 4% and 7% for the second quarter and first six months of 2016 primarily due to an increase in our Distribution Solutions segment. Gross profit margin for the second quarter and first six months of 2016 decreased primarily due to a decline within our Distribution Solutions segment.** * * * Segment Operating Profit **Distribution Solutions: Operating profit margin for the segment increased in 2016 compared to the same periods a year ago primarily due to lower operating expenses, partially offset by a decline in gross profit margin.**
Complaint, ¶158: October 29, 2015 FY2Q16 earnings call	Beer: **Distribution Solutions adjusted gross profit of $2.6 billion decreased 1% on reported basis and increased 4% on a constant currency basis to $2.7 billion. Adjusted gross profit was impacted by growth and demand from our largest customers and weaker generic pricing trends compared to the prior year . . . .**
Complaint, ¶159: November 10, 2015 Credit Suisse Healthcare Conference	Hammergren: **Let me talk a little bit about our North American pharmaceutical distribution business in particular. Clearly, our distribution businesses in the US have grown very strongly . . . .**
Complaint, ¶160: January 11, 2016 Fiscal Year 2017 Outlook Conference Call	Hammergren: **As it relates to what we expect in FY17, included in our guidance, we've indicated that we have really a nominal level of generic inflation. So you should read that as, that even if generic inflation was to drop completely to zero across the board, that our FY17 assumptions basically include that from a perspective is that we have limited risk now in that plan preliminarily.** * * *

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	Garen Sarafian, Analyst, Citigroup: Okay, fair enough. And I guess if I could just have a follow-up to that. Is there any better way to describe your level of conservatism in generic inflation assumptions for next year relative to the past? Hammergren: **It's down quite significantly from what we experienced in FY15, and certainly way down from what we experienced in the first half of FY16. And it's really consistent with what we are experiencing right now and will experience in the fourth quarter, which we think is a real – basically a nominal rate of inflation for generics. And, James, you might have something to add.** Beer: **Yes, I'd just add that our assumption around generic price inflation is actually at a rate lower than what was, if you will, the run rate prior to the more recent years where we'd seen a significant increase in this economic effect.** Hammergren: **To roll back several years ago.** Beer: **Yes.** * * * Hammergren: **I don't think there's any change in the fundamental competitiveness, structure or attractiveness of McKesson going forward. Other than the fact that we did a superior job I believe in our generic activity, and benefited significantly from our teams focused on taking advantage of the available opportunities. It's one thing to have price inflation in the generic focus, it's another thing to capture value for our shareholders when that inflation occurs. And we did a marvelous job of accomplishing that over the last several years, and benefited from it. Now that that opportunity set is waning, it doesn't matter how good our team is at exercising their skill set against the opportunity. There's just not enough inflation left in the system for us to benefit from it, and that's a big portion of the challenge that we face as we think about next year.** **Having set our FY17 objectives with a nominal rate of benefit from price trends in generics, we think we have derisked our FY17 thinking in that area.**
Complaint, ¶178: January 27, 2016 Fiscal Year Third Quarter of 2016 ("FY3Q16") Form 8-K, signed by Beer, and FY3Q16 Form 10-Q, signed	**Revenues for the third quarter and first nine months of 2016 increased 3% and 8% compared to the same periods a year ago. Excluding unfavorable foreign currency effects of 2%, revenues increased 5% and 10% for the third quarter and first nine months of 2016 primarily due to our Distribution Solutions segment, which accounted for approximately 99% of our consolidated revenues.** Distribution Solutions

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and certified by Hammergren and Beer	**North America pharmaceutical distribution and services revenues for the third quarter and first nine months of 2016 increased primarily due to market growth and our mix of business** including expanded business with existing customers. These increases were partially offset by customer losses. **Market growth includes growing drug utilization, newly launched drugs, price increases and price deflation**, including deflation associated with brand to generic drug conversions. * * * **Gross profit for the third quarter and the first nine months of 2016 remained relatively unchanged compared to the same periods a year ago. Excluding unfavorable foreign currency effects of 3% and 4%, gross profit increased 2% and 5% for the third quarter and first nine months of 2016 primarily due to an increase within our Distribution Solutions segment. Gross profit margin for the third quarter and first nine months of 2016 decreased primarily due to a decline within our Distribution Solutions segment.**
Complaint, ¶161: January 27, 2016 FY3Q16 earnings call	Beer: **Distribution Solutions' adjusted gross profit of $2.5 billion decreased 3% on a reported basis, and increased 1% on a constant-currency basis, to $2.6 billion.** **Overall, the third-quarter adjusted gross profit reflected our mix of business, including** a growing proportion of specialty pharmaceuticals, **a weaker profit contribution from generic pricing trends when compared to the prior year . . . .**
Complaint, ¶179: May 4, 2016 Fiscal Year Fourth Quarter of 2016 ("FY4Q16") Form 8-K, signed by Beer, and May 5, 2016 Fiscal Year 2016 ("FY2016") Form 10-K, signed and certified by Hammergren and Beer	[From May 5, 2016 Form 10-K] **Revenues increased 7% and 30% in 2016 and 2015 compared to the same periods a year ago. Excluding unfavorable foreign currency effects of 2%, revenues increased 9% in 2016. These increases were primarily driven by our Distribution Solutions segment, which accounted for approximately 98% of our consolidated revenues.** Distribution Solutions **North America pharmaceutical distribution and services revenues increased over the last two years primarily due to market growth,** expanded business with existing customers **and our mix of business**. These increases were partially offset by customer losses. **Market growth reflects growing drug utilization, which includes newly launched drugs and price increases**, partially offset by price deflation associated with brand to generic drug conversions. * * *

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	Distribution Solutions segment's gross profit was flat in 2016 and increased in 2015. Excluding unfavorable foreign currency effects of 4%, gross profit increased 4% in 2016. Gross profit margin decreased in 2016 primarily due to a lower sell margin within our North America distribution business driven by increased customer sales volume with some of our largest customers, **partially offset by higher buy margin including benefits from our global procurement arrangements**, lower LIFO-related inventory charges and $76 million in cash receipts representing our share of antitrust legal settlements. **Additionally, this business has been experiencing weaker generic pharmaceutical pricing trends, which are expected to continue in 2017. Buy margin primarily reflects volume and timing of compensation we receive from pharmaceutical manufacturers, including the effects of price increases of** both branded and **generic drugs**. * * * Segment Operating Profit **Operating profit increased over the last two years primarily due to growth in our business** and for 2015 due to our business acquisitions. **Operating profit margin for 2016 increased due to lower operating expenses as a percentage of revenues, partially offset by a decline in gross profit margin.** Operating profit and operating profit margin in 2016 includes $161 million of pre-tax charges associated with the Cost Alignment Plan, lower LIFO charges, and a $52 million pre-tax gain on the sale of our ZEE Medical business. **Operating profit margin for 2015 decreased** primarily due to our acquisition of Celesio and the unfavorable impact from the newly launched drugs for Hepatitis C, **partially offset by our other mix of business.** * * * 2017 Outlook **Information regarding the Company's 2017 outlook is contained in our Form 8-K dated May 5, 2016[4].** * * * [From May 4, 2016 Form 8-K] **McKesson Corporation (NYSE:MCK) today reported that revenues for the fourth quarter ended March 31, 2016 were $46.7 billion, up 4% compared to $44.9 billion a year ago. On a constant**

[4] McKesson did not file a Form 8-K on May 5, 2016. The Form 8-K with 2017 outlook was filed on May 4, 2016.

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	currency basis, revenues increased 5% over the prior year. On the basis of U.S. generally accepted accounting principles ("GAAP"), fourth-quarter earnings per diluted share from continuing operations was $1.97 compared to $1.69 a year ago. Fourth-quarter Adjusted Earnings per diluted share was $2.44, down 17% compared to the prior year. **For the fiscal year, McKesson had revenues of $190.9 billion, up 7% compared to $179.0 billion a year ago. On a constant currency basis, revenues increased 9% over the prior year. Full-year GAAP earnings per diluted share from continuing operations was $9.84 compared to $7.54 a year ago, up 31% year-over-year. Full-year Adjusted Earnings per diluted share was $12.08, up 9% compared to the prior year.** * * * **Distribution Solutions revenues were $45.9 billion for the quarter, up 4% on a reported basis and 5% on a constant currency basis. For the full year, Distribution Solutions revenues were $188.0 billion, up 7% on a reported basis and 9% on a constant currency basis, compared to the prior year.** * * * [Distribution Solutions] **Fourth-quarter Distribution Solutions GAAP operating profit was $811 million and GAAP operating margin was 1.77%. On a constant currency basis, fourth-quarter adjusted operating profit was $970 million and adjusted operating margin was 2.09%.** [Segment Operating Profit] **For the full year, Distribution Solutions GAAP operating profit was $3.6 billion and GAAP operating margin was 1.89%. On a constant currency basis, full-year adjusted operating profit was $4.4 billion, up 5% compared to the prior year, and adjusted operating margin was 2.28%.** * * * Fiscal Year 2017 Outlook **For the fiscal year ending March 31, 2017, McKesson expects $13.30 to $13.80 per diluted share**, which excludes approximately 12 to 15 cents in expected charges from Adjusted Earnings related to the Cost Alignment Plan. **"Our Fiscal 2017 outlook balances solid growth across our businesses and growth from capital deployment, with the negative**

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	impact from customer consolidation and **generic pharmaceutical pricing trends in the United States,"** concluded Hammergren. Key Assumptions for Fiscal Year 2017 Outlook **The Fiscal 2017 outlook is based on the following key assumptions …:** • **Distribution Solutions revenue growth is expected to increase by high-single digits driven by market growth** and acquisitions. * * * • **We expect a nominal contribution to our Fiscal 2017 results from generic pharmaceuticals that increase in price.**
Complaint, ¶¶129, 162: May 4, 2016 FY4Q16 earnings call	Hammergren: **However, on a small group of generic drugs, as we have in the past, we expect we will continue to experience price increases.** **When we talk about generic inflation at McKesson, we are specifically referring only to the small subset of generics that experience a price increase. As we think about fiscal 2017 we expect a nominal contribution from those generic pharmaceuticals that will increase in price.** * * * Charles Rhyee, Analyst, Cowen and Company: And just to follow up, when you talk about – when you imbed in your assumptions around it, do you guys also take into the political climate? Obviously, we are in an election year. Do you try to factor some of that into your assumptions as well as we think about the coming year? Hammergren: **Sure, we're not oblivious to the conversations that is going on in the media and with the current political activity, and we're certainly not oblivious to the investigations and conversations that have been going on from a congressional perspective into these areas. I think our assumptions are reasonable and they are based on our historical work with the manufacturers and certainly buffered by what we see as the current climate. So I would say as we stated today, we believe the assumptions are realistic and are likely to occur in the way we have laid them out in our fiscal 2017 guidance.**
Complaint, ¶164: June 29, 2016 McKesson's Annual Investor Day	Hammergren: **So let me talk a little bit about the three big themes that we think are on your minds. Clearly generics continues to be a very important part of McKesson's profitability profile and our strategy. I know some of you believe that we're in the waning**

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	phases of generics, but we think we are continuing to see great opportunities in generics. * * * **As it relates to our negotiation with manufacturers, I don't want to get necessarily into the details. But you can imagine that as Paul said earlier given that we are extremely intimate globally to these manufacturers, we understand what they are doing around the world on a real-time basis, not only in terms of the negotiating teams we have at a country level but also our global team in London.** **We have a perspective that I think is very well informed. And one of the things that we have a responsibility to do on a regular basis is to make sure that the product pricing we're giving to our customers is extremely competitive.**
Complaint, ¶180: July 27, 2016 Fiscal Year First Quarter of 2017 ("FY1Q17") Form 8-K, signed by Beer, and FY1Q17 Form 10-Q, signed and certified by Hammergren and Beer	**Revenues for the first quarter of 2017 increased 5% compared to the same period a year ago primarily due to our Distribution Solutions segment, which accounted for approximately 99% of our consolidated revenues.** Distribution Solutions **North America pharmaceutical distribution and services revenues for the first quarter of 2017 increased primarily due to market growth**, increased sales associated with our acquisitions of Vantage and Biologics and expanded business with existing customers. These increases were partially offset by customer losses. * * * **Gross profit for the first quarter of 2017 increased 2% compared to the same period a year ago due to growth in** both of **our operating segments: Distribution Solutions** and Technology Solutions. **Gross profit margin for the first quarter of 2017 decreased primarily due to a decline within our Distribution Solutions segment.** Distribution Solutions **Distribution Solutions segment's gross profit for the first quarter of 2017 increased compared to the same period a year ago primarily due to increased sales volume within our North America business, benefits from our global procurement arrangements,** our recent acquisitions and lower LIFO expenses, as further discussed below. * * * Segment Operating Profit **Distribution Solutions: Operating profit increased for the segment in 2017 compared to the same period a year ago. Operating**

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	profit margin for the first quarter of 2017 decreased primarily due to lower gross profit margin.
Complaint, ¶181: October 27, 2016 Fiscal Year Second Quarter of 2017 ("FY2Q17") Form 8-K, signed by Beer, and FY2Q17 Form 10-Q, signed and certified by Hammergren and Beer	**Revenues for the second quarter and first six months of 2017 increased 2% and 4% compared to the same periods a year ago primarily due to our Distribution Solutions segment, which accounted for approximately 99% of our consolidated revenues.** Distribution Solutions **North America pharmaceutical distribution and services revenues for the second quarter and first six months of 2017 increased primarily due to market growth**, increased sales associated with our acquisitions including Vantage and Biologics and expanded business with existing customers. These increases were partially offset by customer losses. * * * **Gross profit and gross profit margin for the second quarter and first six months of 2017 decreased compared to the same periods a year ago primarily due to a decline in our Distribution Solutions segment.** Distribution Solutions **Distribution Solutions segment's gross profit and gross profit margin for the second quarter and first six months of 2017 decreased compared to the same periods a year ago due to weaker pharmaceutical pricing trends, the competitive pricing environment** and lower compensation from a branded pharmaceutical manufacturer **from our U.S. Pharmaceutical distribution business. These decreases were partially offset by** our acquisitions, **benefits from our global procurement arrangements** and lower LIFO inventory charges. Gross profit for 2017 also reflects the impact of previously announced customer consolidation activity. * * * Segment Operating Profit **Distribution Solutions: Operating profit and operating profit margin decreased for the second quarter and first six months of 2017 compared to the same periods a year ago primarily due to lower gross profit.**

INTERROGATORY NO. 8:

For each statement you identify in response to Interrogatory No. 7, state with specificity which words, phrases or portions you believe are false, misleading, and/or which material facts were omitted.

RESPONSE TO INTERROGATORY NO. 8:

Lead Plaintiff incorporates each of the foregoing General Objections above as if set forth herein. Lead Plaintiff also objects to this Interrogatory as compound, as it contains multiple subparts seeking discrete information, but purports to count as only one interrogatory for purposes of the limitations set forth in Rule 33. Lead Plaintiff expressly reserves all rights to treat each discrete subpart of this Interrogatory as a separate interrogatory for purposes of the limitations set forth in Rule 33 or in any subsequent court order modifying such limitations in the above-captioned action.

Lead Plaintiff also objects to this Interrogatory on the grounds that it calls for a legal conclusion, a legal argument or constitutes a contention discovery request that is premature at this stage of the litigation. *See, e.g.*, *Folz v. Union Pac. R.R. Co.*, No. 13-CV-00579-GPC-(PCL), 2014 U.S. Dist. LEXIS 15020, at *5-*6 (S.D. Cal. Jan. 31, 2014) ("many courts have found that, within the framework of Rule 33, contention interrogatories need not be answered until the substantial completion of pretrial discovery") (citing *In re eBay Seller Antitrust Litig.*, No. C-07-1882 JF (RS), 2008 U.S. Dist. LEXIS 102815 (N.D. Cal. Dec. 11, 2008), and *City & County of San Francisco v. Tutor-Saliba Corp.*, 218 F.R.D. 219, 222 (N.D. Cal. 2003)); *see also Folz*, 2014 U.S. Dist. LEXIS 15020, at *6 ("courts are reluctant to allow contention interrogatories, especially when the responding party has not yet obtained enough information through discovery to respond") (citing *In re Convergent Techs. Sec. Litig.*, 108 F.R.D. 328, 338 (N.D. Cal. 1985), and *United States v. Bazaarvoice, Inc.*, No. C-13-00133 EMC (LB), 2013 U.S. Dist. LEXIS 58237 (N.D. Cal. Apr. 22, 2013)). Lead Plaintiff also objects to this Interrogatory on the grounds that it seeks or requires the disclosure of information that is protected from discovery by the attorney work-product doctrine. Lead Plaintiff also objects to this Interrogatory as premature in that fact discovery in this case is ongoing and Defendants have only recently begun producing documents in earnest that are responsive to Lead Plaintiff's document requests after having failed to comply with the January 29, 2021 deadline for substantial completion of Defendants' document productions. Lead Plaintiff also objects to the extent this Interrogatory seeks information that has been destroyed or otherwise not preserved by McKesson as a result of, *inter alia*, McKesson's automatic email deletion policies in place during the relevant time period and/or McKesson's failure to timely institute litigation holds over relevant information. Lead Plaintiff also objects that with Lead Plaintiff having identified each false and misleading statement and omission, information responsive to this Interrogatory is already available to Defendants inasmuch as they already possess all necessary information to realize why their statements and omissions identified in the Complaint were false and misleading.

Subject to and without waiving the foregoing objections, Lead Plaintiff responds as follows: The allegations supporting each Defendant's responsibility for false and misleading statements and omissions made during their employment at McKesson are set forth in the Complaint, which the Court has upheld as legally and factually sufficient. As of this time,

Defendants are still producing internal documents and fact depositions have not yet begun. Such additional discovery will likely reveal additional facts demonstrating the falsity and misleading nature of Defendants' identified statements, in addition to the facts identified in the Complaint that the Court has already deemed legally sufficient to establish Defendants' liability.

INTERROGATORY NO. 9:

For each statement you identify in response to Interrogatory No. 7, state why you believe it was false or misleading.

RESPONSE TO INTERROGATORY NO. 9:

Lead Plaintiff incorporates each of the foregoing General Objections above as if set forth herein. Lead Plaintiff objects to this Interrogatory on the grounds that it calls for a legal conclusion, a legal argument or constitutes a contention discovery request that is premature at this stage of the litigation. *See, e.g.*, *Folz v. Union Pac. R.R. Co.*, No. 13-CV-00579-GPC-(PCL), 2014 U.S. Dist. LEXIS 15020, at *5-*6 (S.D. Cal. Jan. 31, 2014) ("many courts have found that, within the framework of Rule 33, contention interrogatories need not be answered until the substantial completion of pretrial discovery") (citing *In re eBay Seller Antitrust Litig.*, No. C-07-1882 JF (RS), 2008 U.S. Dist. LEXIS 102815 (N.D. Cal. Dec. 11, 2008), and *City & County of San Francisco v. Tutor-Saliba Corp.*, 218 F.R.D. 219, 222 (N.D. Cal. 2003)); *see also Folz*, 2014 U.S. Dist. LEXIS 15020, at *6 ("courts are reluctant to allow contention interrogatories, especially when the responding party has not yet obtained enough information through discovery to respond") (citing *In re Convergent Techs. Sec. Litig.*, 108 F.R.D. 328, 338 (N.D. Cal. 1985), and *United States v. Bazaarvoice, Inc.*, No. C-13-00133 EMC (LB), 2013 U.S. Dist. LEXIS 58237 (N.D. Cal. Apr. 22, 2013)). Lead Plaintiff also objects to this Interrogatory on the grounds that it seeks or requires the disclosure of information that is protected from discovery by the attorney work-product doctrine. Lead Plaintiff also objects to this Interrogatory as premature in that fact discovery in this case is ongoing and Defendants have only recently begun producing documents in earnest that are responsive to Lead Plaintiff's document requests after having failed to comply with the January 29, 2021 deadline for substantial completion of Defendants' document productions. Lead Plaintiff also objects to the extent this Interrogatory seeks information that has been destroyed or otherwise not preserved by McKesson as a result of, *inter alia*, McKesson's automatic email deletion policies in place during the relevant time period and/or McKesson's failure to timely institute litigation holds over relevant information. Lead Plaintiff also objects that with Lead Plaintiff having identified each false and misleading statement and omission, information responsive to this Interrogatory is already available to Defendants inasmuch as they already possess all necessary information to realize why their statements and omissions identified in the Complaint were false and misleading.

Lead Plaintiff also objects to this Interrogatory as compound, as it contains multiple subparts seeking discrete information, but purports to count as only one interrogatory for purposes of the limitations set forth in Rule 33. Lead Plaintiff also objects to this Interrogatory because, absent agreement of the parties or a court order, Lead Plaintiff is obligated to respond to only 25 separate interrogatories, including subparts, pursuant to Rule 33. Interrogatory No. 8 above contains subparts that are comprised of separate inquiries into separate statements and omissions. Thus, the 25-interrogatory limit was reached with Interrogatory No. 8 above.